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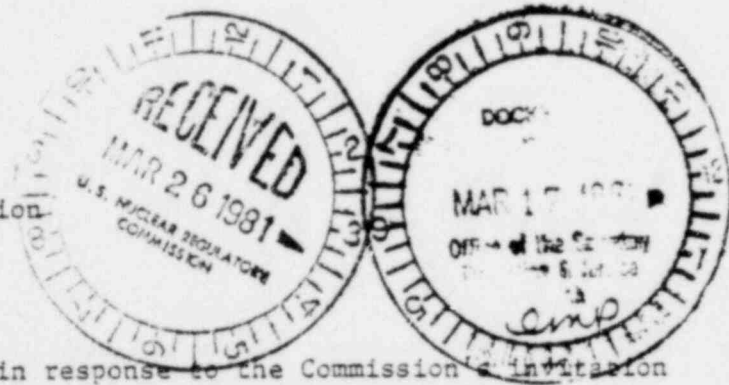
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ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N. Y. 14649

TELEPHONE  
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March 6, 1981

Mr. Samuel J. Chilk  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555



Dear Mr. Chilk:

This correspondence is in response to the Commission's invitation for comments which appeared in the Federal Register notice (45 Fed. Reg. 85459) relative to proposed amendments to Commission regulations to prohibit the unauthorized disclosure of certain safeguards information.

Rochester Gas and Electric Corporation is generally supportive of the concept of protecting certain safeguards information from disclosure. However, after studying the proposed amendments, we feel it may have become overly concerned with certain physical aspects of an information protection program while overlooking other aspects which are of specific concern to our particular industry. It appears that a great deal of emphasis has been placed on the industry's role in controlling information in our possession while allowing a rather liberal dissemination of such information once it enters the licensing arena. It seems incongruous that licensees should be subjected to rigorous standards of trustworthiness and then have "need to know" determinations made by individuals within the public sector who are not compelled to meet any such standards. An attendant concern is the fact that we as licensees would lose the capability to classify information ourselves due to the pending revision of 10 CFR 2.790(d). We believe that the loss of this ability coupled with the exclusion of certain site specific information such as the guard Training and Qualification Plan and generic safeguards studies which may have site specific connotations may counter the proposed program.

We are also concerned with the Commission's cost estimates for such an information protection program. cursory review of the estimates provided in the section on Agency Proceedings, when divided by the known number of operating units, corporate headquarters, Architect/Engineers, security contractors, consultants, etc., shows that the Commission has greatly underestimated the economic impact of such a program on the industry and its ratepayers.

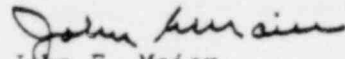
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TO Mr. Samuel J. Chilk

In conclusion, it is our recommendation that careful consideration be given to the focus of the proposed amendment so that the most essential information can be protected, as determined by those of us who produce that information, and that the systems proscribed by the program for protection of that information be of types which are not burdensome to establish or manage.

Very truly yours,



John E. Maier  
Vice President  
Electric & Steam Production